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U.S. Department of State, CA/OCS/PRI

Adoption Regulations Docket Room

SA-29

2201 C Street, N.W, Washington, DC 20520

Comments in reference to docket number State/AR-01/96

As an adoptive parent, and as a Board Member and an adoption professional for the past twelve years, I want to offer the following suggestions regarding the proposed regulations:

1. Lower the \$1,000,000 minimum limit requirement on adoption agency liability insurance. This insurance has become increasingly expensive during the past few years, and our previous carrier has stopped underwriting adoption agencies as of this year. We have been looking for a new carrier for the past two months, and have not yet found one. I also believe that this high limit will encourage unnecessary lawsuits to be filed against agencies.
2. Eliminate the requirement for agencies to carry 3 months of operating expenses. Our agency is heavily dependent on donations, in addition to fees, and the variations in the economy, coupled with the uncertainty of international adoption programs, may prevent us from being able to fulfill this requirement. I believe this will force many small agencies to go out of business.
3. Allow more time for state licensing entities and organizations other than the COA to become accrediting entities for the Hague regulations. I believe having only one or two alternatives will not provide a safeguard against exorbitant accrediting fees.
4. Reduce the requirement that Home Study caseworkers have a Masters degree. I think that either a Bachelors degree, or documented training and experience should suffice. It is not feasible for every Home Study caseworker in my agency to have a Masters degree. It would be impossible to find enough people, and would also cost too much. Further, a Masters degree does not insure more quality than a person who has learned from years of experience.
5. Lastly, I request in that these regulations be rewritten AND republished BEFORE becoming final.

Respectfully submitted,

Joe Woods
HOPE for Children, Inc.

Member:
Joint Council on International Children's Services
Georgia Assoc. of Licensed Adoption Agencies

INTERNATIONAL AND DOMESTIC ADOPTIONS

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